

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Docket No. 05-CR-10053-NMG

TYRONE BATTLE

MOTION FOR PRE-PLEA PRE-SENTENCE REPORT

NOW COMES the defendant in the above-captioned matter, by and through counsel, and moves this Honorable Court to order the preparation of a probation pre-sentence report prior to his entry of a plea in this matter. As reason therefore, the defendant states that he is unsure as to how the probation department will categorize his sentencing guideline range based upon the government's version of the offense, his criminal history category, and probation's own research. This information will permit counsel to more accurately advise the defendant as to the potential benefits of a plea.

Respectfully submitted,
TYRONE BATTLE
By his attorney

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